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February 15, 2019

The Honorable Ajit Pai
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: NPRM on Unlicensed Use of the 6 GHz Band (ET Docket No. 18-295; GN Docket No. 17-183)

Dear Chairman Pai:

The Modesto Irrigation District (MID) writes this letter to express its serious concerns with the Federal Communications Commission's proposal to allow unlicensed devices to operate in the 6 GHz band. We are an independent, publicly-owned utility located in California's Central Valley that provides electric and irrigation services to over 128,000 power and water customers. MID operates point-to-point microwave links in the 6 GHz band to relay mission-critical information that supports the reliability and resiliency of our operations. Permitting unlicensed use in this band without adequate protections will degrade our ability to manage our systems in a safe and reliable manner.

Microwave systems are ideally suited to transmit large amounts of information over long distances and MID employs multiple microwave towers throughout its service area. Our microwave links serve as a backbone for our communications network and enable control room operators to monitor current flow and line voltage from remote sensors and coordinate the tripping of relays to substations to isolate faults.

The rulemaking proposes the use of an Automatic Frequency Control (AFC) solution to mitigate any harmful interference to microwave systems from unlicensed devices in the 6 GHz band. While we recognize policymakers desire to allocate more spectrum for Wi-Fi and Internet of Things applications and services, the AFC proposal is a highly complex experiment that offers no guarantee it will mitigate all interference to incumbent users – a substantial and unacceptable risk for critical infrastructure providers that depend on their microwave networks to deliver “five-nine’s” (e.g., 99.999%) of communications availability. Furthermore, MID and other electric utilities must meet stringent federal standards set by the North American Electric Reliability Corporation (NERC) that address issues of reliability, cybersecurity, and physical security. Any one of these areas could be impacted by unlicensed interference and result in civil penalties of up to \$1 million per day per violation.

It is imperative, that the critical nature of traffic carried over our communications networks must be protected from interference caused by unlicensed spectrum sharing. We therefore urge the Commission to reconsider its recommendations given the mission critical use of the 6 GHz band for public safety, including the reliability of their electric grid. MID would also like to acknowledge the comments filed by the Utilities Telecom Council which underscore the associated risks of this rulemaking to the safe, reliable, and secure delivery of essential electric, gas, and water services to the public.

Sincerely,

Scott Furgerson
General Manager
Modesto Irrigation District